

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.



Order Filed on April 12, 2023
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**ORDER AUTHORIZING THE DEBTOR TO
ACT AS FOREIGN REPRESENTATIVE ON BEHALF OF THE DEBTOR'S ESTATE**

The relief set forth on the following pages is hereby **ORDERED**.

DATED: April 12, 2023


Honorable Michael B. Kaplan
United States Bankruptcy Judge

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

(Page 2)

Debtor: LTL Management LLC

Case No. 23-12825-MBK

Caption: Order Authorizing the Debtor to Act as Foreign Representative on Behalf of the Debtor's Estate

Upon the motion (the "Motion")² of LTL Management LLC, the debtor in the above-captioned case (the "Debtor") pursuant to section 1505 of the Bankruptcy Code and Local Bankruptcy Rule 9013-5, for an order (this "Order") authorizing the Debtor to act as the Foreign Representative on behalf of the Debtor's estate in any judicial or other proceedings in Canada; and this Court having jurisdiction over the matter pursuant to 28 U.S.C. §§ 157(b) and 1334 and the Standing Order of Reference; and venue being proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; notice of the Motion and the hearing before the Court (the "Hearing") being good and sufficient; the Debtor having received informal comments from the U.S. Trustee regarding the Motion and having resolved those comments as set forth in this Order; and upon consideration of the Motion and the Kim Certification, as well as the statements of counsel with respect to the Motion at the Hearing; and this Court having found and determined that the relief sought in the Motion is in the best interests of the Debtor's estate, its creditors and other parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED to the extent set forth below.
2. The Debtor is authorized, pursuant to section 1505 of the Bankruptcy Code, to act as the Foreign Representative on behalf of the Debtor's estate in any judicial or other proceedings in Canada and shall be authorized and have the power to act in any way permitted by applicable foreign law, including, but not limited to (a) seeking recognition of the

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

(Page 3)

Debtor: LTL Management LLC

Case No. 23-12825-MBK

Caption: Order Authorizing the Debtor to Act as Foreign Representative on Behalf of the Debtor's Estate

Chapter 11 Case in the Canadian Proceeding, (b) requesting that the Canadian Court grant comity to the Foreign Representative and the Chapter 11 Case, (c) seeking any other appropriate relief from the Canadian Court that the Debtor deems just and proper in the furtherance of the protection of the Debtor's estate; and (d) consistent with any orders of the Canadian Court, paying the costs of the Court-appointed information officer and its counsel, each without further order of this Court.

3. The Debtor shall file retention applications in this bankruptcy case pursuant to section 327 of the Bankruptcy Code for any professionals it seeks to represent it as the Foreign Representative. In addition, any professionals retained by the Debtor as the Foreign Representative will be required to file monthly, interim and final fee requests for allowance of compensation and reimbursement of expenses pursuant to the procedures set forth in sections 330 and 331 of the Bankruptcy Code, applicable Bankruptcy Rules and the Local Bankruptcy Rules and any other such procedures as may be fixed by order of this Court. Further, any professionals retained by the Debtor as the Foreign Representative that are law firms shall make a reasonable effort to comply with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. Section 330 by Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013, concerning any monthly, interim and final fee requests for allowance of compensation and reimbursement of expenses to be filed in this case. All professionals retained by the Debtor as the Foreign Representative that are law firms shall provide any and all monthly, interim and final fee applications in "LEDES" format to the United States Trustee.

(Page 4)

Debtor: LTL Management LLC

Case No. 23-12825-MBK

Caption: Order Authorizing the Debtor to Act as Foreign Representative on Behalf of the Debtor's Estate

4. This Court requests the aid and assistance of the Canadian Court to recognize the Chapter 11 Case as a “foreign main proceeding” and the Debtor as a “foreign representative” pursuant to the CCAA, and to recognize and give full force and effect in all provinces and territories of Canada to this Order.

5. The requirement set forth in D.N.J. LBR 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

6. The Debtor shall serve a copy of this Order on all parties required to receive service under D.N.J. LBR 9013-5(f) within two (2) days after the entry of this Order.

7. The Debtor is hereby authorized to take all actions it deems necessary to effectuate the relief granted in this Order.

8. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

In re:
LTL Management LLC
Debtor

Case No. 23-12825-MBK
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0312-3
Date Rcvd: Apr 12, 2023

User: admin
Form ID: pdf903

Page 1 of 4
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 14, 2023:

NONE

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
db	+ Email/Text: jkim8@its.jnj.com	Apr 12 2023 20:30:00	LTL Management LLC, 501 George Street, New Brunswick, NJ 08933-0001

TOTAL: 1

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Apr 14, 2023

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 12, 2023 at the address(es) listed below:

Name	Email Address
Adam C. Silverstein	on behalf of Creditor Ad Hoc Committee of Certain Talc Claimants asilverstein@otterbourg.com awilliams@otterbourg.com
Alan J. Brody	on behalf of Creditor Bausch Health Americas Inc. f/k/a Valeant Pharmaceuticals International brody@gtlaw.com, NJLitDock@gtlaw.com
Alan J. Brody	on behalf of Creditor Bausch Health Companies Inc. f/k/a Valeant Pharmaceuticals International Inc. brody@gtlaw.com, NJLitDock@gtlaw.com
Alan J. Brody	on behalf of Creditor Bausch Health US LLC f/k/a Valeant Pharmaceuticals North America LLC brody@gtlaw.com, NJLitDock@gtlaw.com

District/off: 0312-3

User: admin

Page 2 of 4

Date Rcvd: Apr 12, 2023

Form ID: pdf903

Total Noticed: 1

Allen Joseph Underwood, II

on behalf of Creditor DeSanto Canadian Class Action Creditors aunderwood@litedepalma.com
ajunderwood@ecf.courtdrive.com;grodriguez@litedepalma.com

Allison Meghan Brown

on behalf of Plaintiff LTL Management LLC allison.brown@skadden.com
wendy.lamanna@skadden.com;Stephanie.Martin@skadden.com

Allison Meghan Brown

on behalf of Debtor LTL Management LLC allison.brown@skadden.com
wendy.lamanna@skadden.com;Stephanie.Martin@skadden.com

Andrew J. Kelly

on behalf of Creditor BCBS of Massachusetts akelly@kbtlaw.com wsheridan@kbtlaw.com

Andrew J. Kelly

on behalf of Interested Party BCBS of Massachusetts akelly@kbtlaw.com wsheridan@kbtlaw.com

Andy Frankel

on behalf of Interested Party Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)
afrankel@stblaw.com

Bethany Theriot

on behalf of Interested Party United States of America bethany.theriot@usdoj.gov

Brian J. McCormick, Jr.

on behalf of Creditor Various Talc Claimants bmccormick@rossfellerccasey.com earend@rossfellerccasey.com

Brian J. McCormick, Jr.

on behalf of Creditor Ross Feller Casey LLP bmccormick@rossfellerccasey.com, earend@rossfellerccasey.com

Brian W. Hofmeister

on behalf of Creditor Kellie Brewer bwh@hofmeisterfirm.com j119@ecfbis.com

Brian W. Hofmeister

on behalf of Creditor Various Talc Claimants bwh@hofmeisterfirm.com j119@ecfbis.com

Christopher M. Placitella

on behalf of Creditor Catherine Forbes cplacitella@cprlaw.com cmcnelis@cprlaw.com

Clay Thompson

on behalf of Interested Party Various Talc Claimants cthompson@mrhfmllaw.com

Daniel Stolz

on behalf of Creditor Ad Hoc Committee of Certain Talc Claimants dstolz@genovaburns.com
dstolz@ecf.inforuptcy.com;msousa@genovaburns.com

Daniel Stolz

on behalf of Creditor Ad Hoc Committee of Creditors dstolz@genovaburns.com
dstolz@ecf.inforuptcy.com;msousa@genovaburns.com

Daniel Robert Lapinski

on behalf of Interested Party Various Talc Claimants dlapinski@motleyrice.com
hfonseca@motleyrice.com,kdotson@motleyrice.com

David J. Molton

on behalf of Creditor Ad Hoc Committee of Certain Talc Claimants dmolton@brownrudnick.com hcohen@brownrudnick.com

Derek J. Baker

on behalf of Interested Party Cyprus Mines Corporation dbaker@reedsmith.com

Donald W Clarke

on behalf of Creditor Ad Hoc Committee of Creditors dclarke@genovaburns.com dclarke@ecf.inforuptcy.com

Donald W Clarke

on behalf of Creditor Ad Hoc Committee of Certain Talc Claimants dclarke@genovaburns.com dclarke@ecf.inforuptcy.com

E. Richard Dressel

on behalf of Creditor Giovanni Sosa rdressel@lexnovalaw.com

E. Richard Dressel

on behalf of Creditor Evan Plotkin rdressel@lexnovalaw.com

James N. Lawlor

on behalf of Debtor LTL Management LLC jlawlor@wmd-law.com

James N. Lawlor

on behalf of Plaintiff LTL Management LLC jlawlor@wmd-law.com

Jeffrey M. Sponder

on behalf of U.S. Trustee U.S. Trustee jeffrey.m.sponder@usdoj.gov jeffrey.m.sponder@usdoj.gov

Jerome Howard Block

District/off: 0312-3

User: admin

Page 3 of 4

Date Rcvd: Apr 12, 2023

Form ID: pdf903

Total Noticed: 1

on behalf of Interested Party Paul Crouch jblock@levylaw.com

Jerome Howard Block

on behalf of Interested Party Randy Derouen jblock@levylaw.com

John Maloney

on behalf of Interested Party Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)
jmaloney@lawgmm.com

John M. August

on behalf of Creditor Anthony Hernandez Valadez jaugust@saiber.com rtucker@saiber.com

John M. August

on behalf of Creditor Various Talc Claimants jaugust@saiber.com rtucker@saiber.com

John W. Weiss

on behalf of Interested Party Various Talc Personal Injury Claimants jweiss@pashmanstein.com

John Zachary Balasko

on behalf of Interested Party United States of America john.z.balasko@usdoj.gov

Kenneth A. Rosen

on behalf of Interested Party Johnson & Johnson and Johnson & Johnson Holdco (NA) Inc. krosen@lowenstein.com
dclaussen@lowenstein.com

Lauren Bielskie

on behalf of U.S. Trustee U.S. Trustee lauren.bielskie@usdoj.gov

Leah Cylia Kagan

on behalf of Interested Party Various Talc Claimants lkagan@sgptrial.com

Louis A. Modugno

on behalf of Interested Party Granite State Insurance Company lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party ASR Schadeverzekering N.V. lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party AIG Europe S.A. lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party Lexington Insurance Company lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party The Insurance Company of the State of Pennsylvania Philadelphia lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party N.V. Schadeverzekeringsmaatschappij Maas Lloyd lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party AIU Insurance Company lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party National Union Fire Insurance Company of Pittsburgh Pa. lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party Atlanta International Insurance Company lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party AIG Property Casualty Company lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party New Hampshire Insurance Company lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party Starr Indemnity & Liability Company lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party The North River Insurance Company lmodugno@tm-firm.com

Louis A. Modugno

on behalf of Interested Party RheinLand Versicherungen lmodugno@tm-firm.com

Mitchell Malzberg

on behalf of Creditor Various Talc Claimants mmalzberg@mjmalzberglaw.com dlapham@mjmalzberglaw.com

Moshe Maimon

on behalf of Interested Party Various Talc Claimants mmaimon@levylaw.com mmastrogiacono@levylaw.com

Paul R. DeFilippo

on behalf of Debtor LTL Management LLC pdefilippo@wmd-law.com

Paul R. DeFilippo

District/off: 0312-3

User: admin

Page 4 of 4

Date Rcvd: Apr 12, 2023

Form ID: pdf903

Total Noticed: 1

on behalf of Plaintiff LTL Management LLC pdefilippo@wmd-law.com

Richard G. Haddad

on behalf of Creditor Ad Hoc Committee of Certain Talc Claimants rhaddad@otterbourg.com
akramer@otterbourg.com;awilliams@otterbourg.com;pmcternan@otterbourg.com

Robin Rabinowitz

on behalf of Interested Party Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)
rrabinowitz@lawgmm.com

Sommer Leigh Ross

on behalf of Interested Party The Insurance Company of the State of Pennsylvania Philadelphia slross@duanemorris.com,
AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party New Hampshire Insurance Company slross@duanemorris.com
AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party The North River Insurance Company slross@duanemorris.com
AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party RheinLand Versicherungen slross@duanemorris.com AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party N.V. Schadeverzekeringsmaatschappij Maas Lloyd slross@duanemorris.com
AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party Atlanta International Insurance Company slross@duanemorris.com
AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party Starr Indemnity & Liability Company slross@duanemorris.com
AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party AIG Property Casualty Company slross@duanemorris.com AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party AIU Insurance Company slross@duanemorris.com AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party Lexington Insurance Company slross@duanemorris.com AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party New Jersey Coverage Action Plaintiff-Insurers slross@duanemorris.com
AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party Granite State Insurance Company slross@duanemorris.com AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party AIG Europe S.A. slross@duanemorris.com AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party ASR Schadeverzekering N.V. slross@duanemorris.com AutoDocketWILM@duanemorris.com

Sommer Leigh Ross

on behalf of Interested Party National Union Fire Insurance Company of Pittsburgh Pa. slross@duanemorris.com,
AutoDocketWILM@duanemorris.com

Stephen M. Packman

on behalf of Attorney Roger Frankel as Legal Representative for Future Personal Injury Claimants appointed in the Chapter 11
bankruptcy case of Cyprus Mines Corporation spackman@archerlaw.com, dleney@archerlaw.com,ahuber@archerlaw.com

Stephen V. Gimigliano

on behalf of Interested Party Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)
sgimigliano@lawgmm.com

Suzanne Ratcliffe

on behalf of Interested Party Various Talc Claimants sratcliffe@mrhfmlaw.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

Walter Benzija

on behalf of Creditor The Blue Cross Blue Shield Association wbenzija@halperinlaw.net mmurrayhbb@outlook.com

TOTAL: 79